

EXHIBIT E

Page 125

1 Q. How many times have you met Mr. Kotz?

2 A. More than two times.

3 Q. Okay. Did you ever meet with Mr. Kotz as
4 part of signing any of the loan documents?

5 A. At his office.

6 Q. Okay. Was that every time you signed a
7 loan document or some of the times that you signed
8 the loan documents?

9 A. I don't know it's the loan documents or
10 what. When we buy the property or sell the
11 properties or -- as I'm the managing member of the
12 Eagle Investments & Properties. So I went with my
13 husband to Mr. Kotz's office.

14 Q. Okay. And when you went to Mr. Kotz's
15 office, was it to sign documents in connection with
16 either buying or selling property?

17 A. Yes.

18 Q. When you went to Mr. Kotz -- let me back
19 up. I think you said when you would sign documents
20 with your husband, your husband would just say, this
21 is a loan for Eagle, I'm good with the terms, please
22 sign this. He typically didn't tell you much more

Page 126

1 about the deal, right?

2 A. No.

3 Q. Other than it was a loan, and I need you
4 to sign it for Eagle?

5 A. That's it.

6 Q. Okay. When you met with Mr. Kotz, did you
7 meet with anyone else at First Class Title?

8 A. His staff.

9 Q. Okay. When you met with them, did you
10 have a chance again to review the terms of whatever
11 documents you were signing?

12 A. No.

13 Q. Were they explained to you, the documents
14 you were signing? For example, was there a
15 discussion between Mr. Kotz or someone from his staff
16 when they said, Ms. Jain, you're sighing this loan
17 document, here's the terms, this is what it is,
18 you're going to buy this property, anything like
19 that?

20 A. Yeah, he always said that. If I'm signing
21 something, he said that, well, this is this document.
22 But he is saying -- but my husband is -- my husband

Page 127

1 knows what's in this documents, so I never paid
2 attention.

3 Q. Okay.

4 A. But he always say that, like what I'm
5 signing.

6 Q. So -- I don't want to put words in your
7 mouth, but to make sure I got it right. So when
8 Mr. Kotz reviewed the loan documents with you, you
9 really didn't pay attention because your husband
10 already told you it was okay to sign, and so you
11 weren't really worried about the particular details,
12 you were just going to sign the documents?

13 A. Yes.

14 Q. Okay. Do you ever recall -- looking at
15 paragraph 42, ma'am, and this is on page 25 of the
16 amended complaint. It says, "The terms that Bala
17 Jain expected to receive in exchange for its funds
18 were memorialized, in part, in an e-mail from Bala
19 Jain's owner, Shail Butani, to Amit Jain and Monika
20 Jain attached hereto as Exhibit 1. Attached to the
21 e-mail was a PowerPoint prepared by Bala Jain that
22 identified the various measures that Amit Jain,